

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ALLEN & COMPANY, LLC, )  
                                )  
                                )  
Plaintiff,                 )  
                                ) No. 08-CV-4596  
v.                            )  
                                )  
SANFORD USD MEDICAL CENTER ) Judge Robert W. Gettleman  
formerly known as SIOUX VALLEY   )  
HOSPITAL and USD MEDICAL CENTER,) Magistrate Judge Arlander Keys  
                                )  
Defendant.                 )

**DEFENDANT'S MOTION FOR EXTENSION OF TIME**

Defendant Sanford Medical Center (“Sanford”), by its attorneys, moves this Court for an order extending by one week the time for Sanford to answer or otherwise respond to the complaint. In support of its motion, Sanford states as follows:

1.       Sanford was served with the complaint in this matter on or about July 15, 2008.
2.       Sanford timely removed Allen & Company, LLC’s complaint from the Circuit Court of the Eighteenth Judicial Circuit, Chancery Division, DuPage County, Illinois to this Court on August 13, 2008.
3.       Pursuant to Fed. R. Civ. P. 81 (c), Sanford’s answer, other defenses, or objections to the complaint are due August 20, 2008.
4.       Sanford’s requests one week of additional time to prepare its response to Allen’s complaint.
5.       This motion is brought in good faith and not for purposes of improper delay.

WHEREFORE, Defendant Sanford Medical Center respectfully requests an order from the Court granting its motion for extension of time and allowing Sanford until August 27, 2008 to answer or otherwise respond to the complaint.

Respectfully submitted,

SANFORD MEDICAL CENTER

By: /s/ Kevin B. Duff  
Kevin B. Duff (#6210491)  
Michael Rachlis  
Darnella J. Ward  
Rachlis Durham Duff & Adler, LLC  
542 S. Dearborn Street, Suite 900  
Chicago, IL 60605  
(312) 733-3950  
(312) 733-3952 (fax)

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

ALLEN & COMPANY, LLC, )  
                                )  
                                )  
Plaintiff,                 )  
                                )  
                                )  
v.                             )      No. 08 C 4596  
                                )  
                                )  
SANFORD USD MEDICAL CENTER )      Hon. Robert W. Gettleman  
formerly known as SIOUX VALLEY )      Magistrate Judge Keys  
HOSPITAL and USD MEDICAL CENTER, )  
                                )  
                                )  
Defendant.                 )

**NOTICE OF MOTION AND CERTIFICATE OF SERVICE**

To: James McCluskey  
Lauryn Parks  
MOMKUS McCLUSKEY, LLC  
1001 Warrenville Road, Suite 500  
Lisle, IL 60532

Please take notice that on Tuesday, August 26, 2008, at 9:15 a.m., we will appear before the Honorable Robert W. Gettleman, or any judge sitting in his stead, in Courtroom 1703, and present Defendant's Motion for Extension of Time.

Dated: August 19, 2008

SANFORD MEDICAL CENTER

By: /s/ Kevin B. Duff  
Kevin B. Duff (#6210491)  
Michael Rachlis (#6203745)  
Darnella J. Ward (#6279493)  
Rachlis Durham Duff & Adler, LLC  
542 South Dearborn Street, Suite 900  
Chicago, Illinois 60605  
phone: 312-733-3950  
fax: 312-733-3952

**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 2008, I electronically filed Defendant's Motion for Extension of Time with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system. A copy of the Motion was served via the CM/ECF system, and/or other electronic means, upon:

James McCluskey  
Lauryn Parks  
MOMKUS McCLUSKEY, LLC  
1001 Warrenville Road, Suite 500  
Lisle, IL 60532

/s/ Kevin B. Duff  
Kevin B. Duff (#6210491)  
Rachlis Durham Duff & Adler, LLC  
542 South Dearborn Street, Suite 900  
Chicago, Illinois 60605  
phone: 312-733-3950  
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